

CORRES. CONTROL
INCOMING LTR NO.

02536 R F 94

DUE
DATE

ACTION

DIST. LTR ENC

BERMAN, H.S.		
CARNIVAL, G.J.		
COPP, R.D.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
FRANZ, W.A.		
HANNI, B.J.		
HEALY, T.J.		
HEDAHL, T.G.		
HILBIG, J.G.		
HUTCHINS, N.M.		
KELL, R.E.		
KIRBY, W.A.		
KUESTER, A.W.		
MAHAFFEY, J.W.		
MANN, H.P.		
MARX, G.E.		
McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SETLOCK, G.H.		
STIGER, S.G.		
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.		
WILSON, J.M.		

Busby W X

McHigh M X

CORRES CONTROL	x	x
ADMIN RECORD/080	X	2
PATS/T130G		

Reviewed for Addressee
Corres. Control RFP

6/24/94
DATE BY

Ref Ltr. #

DOE ORDER #5400.1

Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

JUN 23 1994

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JUN 24 3 50 PM '94

94-DOE-06358

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Gentlemen:

Enclosed are two copies of the Final Operable Unit (OU) No. 9, Technical Memorandum (TM) 1, Field Sampling Plan (FSP), Volume 1, Part A which describes the proposed investigation of tanks located outside of buildings in the Industrial Area (IA). We have received comments on the Draft OU 9 TM 1 from both the Colorado Department of Health (CDH) and Environmental Protection Agency (EPA). Those comments have been incorporated in the final document. A separate review comment sheet is also enclosed. If you find the proposed response acceptable, please sign and return it.

Global issues were raised by EPA that included integration of tank investigations under this TM with other investigations conducted in all IA OUs. An integrated field sampling plan that compares the activities on all IA OUs has been prepared and will shortly be released. This document will ensure that stage 1 activities in the various IA OUs are not redundant. It should also be noted that the investigations proposed in this TM are for tanks located outside of buildings. As such the likelihood of recontamination by subsequent activities such as those associated with Decontamination and Decommissioning (D&D) is minimal.

EPA also suggested that the Department of Energy (DOE) evaluate the advantages of removing underground tanks prior to or as part of the proposed investigations. In many cases underground tanks have already been removed and in other cases large underground concrete tanks have been cleaned, backfilled, and paved over. In either case investigations should now proceed because the tanks are gone or impractical to remove. In some other cases underground tanks are not accessible now due to other ongoing activities. In these cases investigations should not be delayed. Any threat that may exist should be identified now rather than waiting until tank removal is possible. In fact CDH indicated that it prefers that investigations proceed without further delay even if the tanks are in use. Also tank removal is not part of the Phase 1 RCRA Facility Investigation/ Remedial Investigation (RFI/RI) activity as defined in the Interagency Agreement (IAG).

The DOE agrees that EPA's global issues are important and will continue to consider these issues on an ongoing basis. In that regard, DOE will continue to evaluate opportunities to remove tanks and assure that tank investigations are conducted in such a way that efforts either by DOE or the regulatory agencies are not redundant.


ADMIN RECORD

A-0009-000238

JUN 23 1994

The DOE considers this document to be Final and that agency approval has been given by the letter of April 11, 1994, from CDH. That letter indicated agency approval of the TM and the included sampling plan with the inclusion of additional tank investigations in an addendum. The issues related to those additional tanks have not yet been fully resolved. The addendum addressing those tanks will be prepared when the remaining issues are resolved.

Sincerely,



Steve Slaten
IAG Coordinator

Enclosure

cc w/Enclosure:

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cc w/o Enclosure:

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